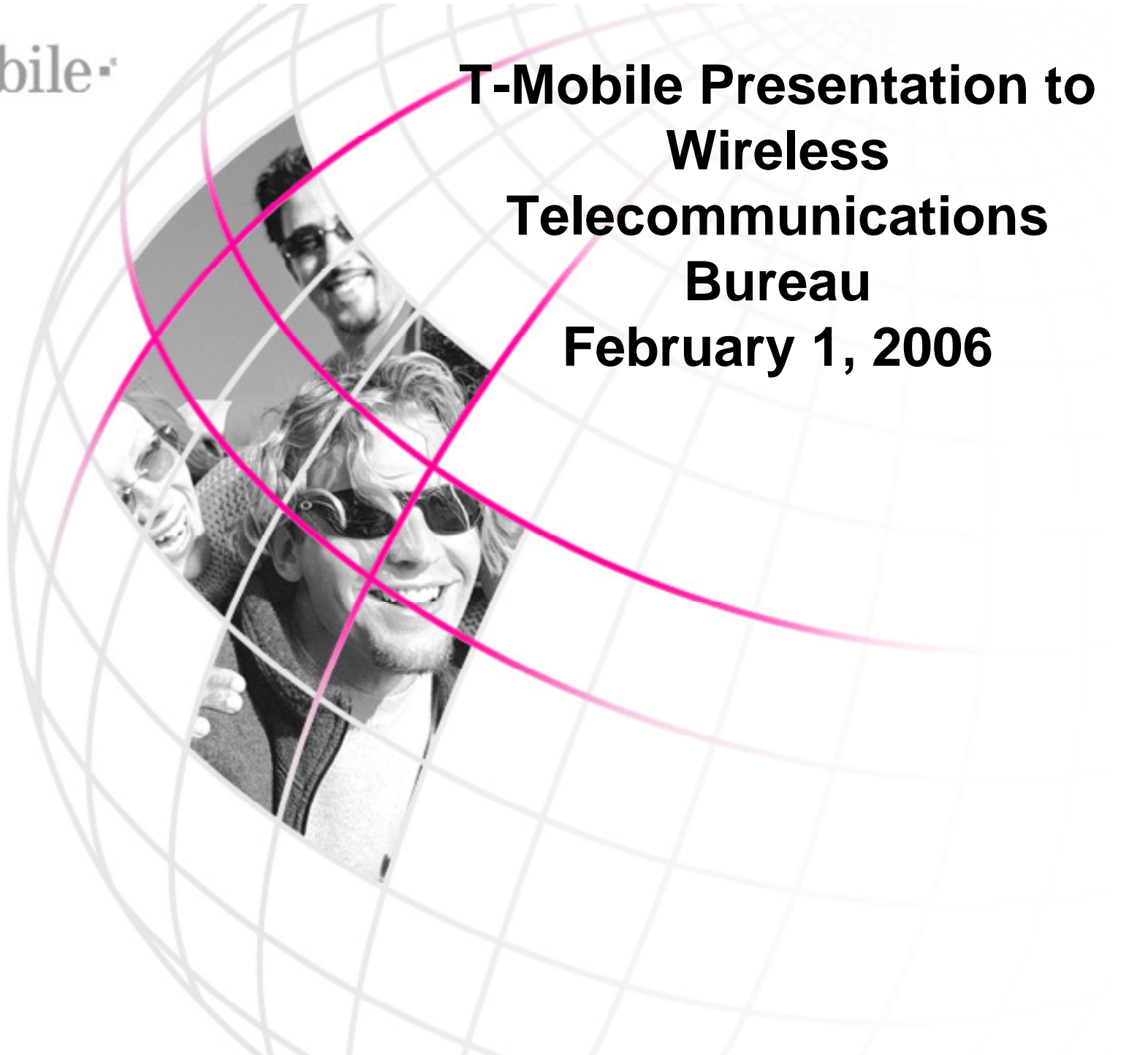




**T-Mobile Presentation to
Wireless
Telecommunications
Bureau
February 1, 2006**



Phantom Traffic Issues

- T-Mobile conditionally supports the USTelecom/BellSouth and Midsize Carrier proposals, with modifications.
- T-Mobile opposes any improper expansion of the *T-Mobile Order*, including authorization for CLECs to request that wireless providers negotiate interconnection agreements.
- Configuration of wireless calls illustrates T-Mobile's concerns with certain proposals.



The Phantom Traffic Issue Is Only A Symptom Of The Fundamental Flaws Of The Existing Intercarrier Compensation Regime.

- The phantom traffic issue arises from the current patchwork of rates based on irrelevant and arbitrary distinctions among different categories of calls.
- Implementation of a bill-and-keep mechanism, or, as a second-best alternative, unified intercarrier compensation rates, best resolves the issue.



- The Commission should not impose a phantom traffic remedy that requires unnecessary investment.
- Until a unitary intercarrier compensation regime is implemented, RLECs must continue to be required to follow the well-established rule that all intra-MTA wireless traffic is local.
- RLEC improper routing of intra-MTA calls to IXCs for delivery to wireless carriers to obtain access charges creates phantom traffic for the terminating carriers.



T-Mobile Supports Aspects Of The USTelecom/BellSouth And Midsize Carrier Proposals, With Conditions.

- USTelecom, BellSouth and the Midsize Carriers do not acknowledge that the technical inability of terminating RLECs to receive telephone number information and their failures to negotiate traffic exchange arrangements with wireless carriers are significant parts of the problem.
 - Many RLECs do not have SS7 capabilities.
 - Many RLECs have no traffic exchange agreements with wireless carriers incorporating traffic allocation factors. BellSouth correctly notes that if the originating carrier can be identified, and jurisdiction is not intentionally disguised, jurisdiction can be determined based on the use of agreed-upon factors.
- All phantom traffic rules must apply in both directions (*i.e.*, to originating RLECs as well).



- With these caveats, T-Mobile can support the following aspects of the USTelecom/BellSouth and Midsize Carrier proposals, with modifications, as discussed in its December 22, 2005 *ex parte* letter.
 - The phantom traffic definition should cover only situations where the inability to identify the originating carrier or jurisdiction of a call is caused by mislabeling, failure to label or intentional misrouting.
 - The originating carrier should always transmit: (a) the CPN, if using SS7 (or the CN when appropriate); or (b) the ANI, if using MF signaling.
 - T-Mobile supports the *voluntary* population of the JIP. T-Mobile passes both CPN and JIP data today. JIP should not be mandatory, consistent with ATIS position.



- All intermediate carriers should be required to forward all call origination information received from the originating or subsequent carriers in the chain, modifying it only as required by industry practice.
- Tandem transit providers should provide “EMI” (or terminating access) records to terminating carriers.
- The “N-1” carrier, *i.e.*, the last carrier in the chain with a retail relationship with the caller, should route an interconnected call using the LERG, with the clarification that the routing and rating points for any wireless call may be different.
- Parties should be able to bring enforcement actions under Section 208 and existing procedures to remedy violations of any phantom traffic rules. No new enforcement mechanisms are necessary. Parties must not block calls they regard as phantom traffic or use other “self-help” remedies.



The *T-Mobile Order* Should Be Clarified But Not Improperly Expanded

- The Commission should promptly resolve all petitions to clarify or reconsider the *T-Mobile Order*.
- T-Mobile opposes any expansion of wireless carriers' obligations to negotiate traffic exchange agreements to benefit carriers other than ILECs.
 - USTelecom and BellSouth now propose that the *T-Mobile Order* be expanded to provide all carriers the ability to invoke the Section 251/252 process with one another.
 - RLECs should use the remedies already available under the *T-Mobile Order* before seeking additional ones.



- The Commission should reject, as untimely, Globalcom's recent request that: (1) the Commission deny the MetroPCS PFR and clarify that CLEC wireless termination tariffs were always permitted; and (2) Section 20.11 be amended to grant CLECs authorization to request interconnection from wireless providers.
 - Xspedius' similar untimely request for prospective relief also should be rejected.
- Wireless providers have no Section 251/252 obligations to CLECs.
- There is no justification for unilateral CLEC wireless termination tariffs for past periods or for authorization to CLECs to request wireless providers to negotiate under Section 252 procedures.



Critical Differences Between Wireline And Wireless Networks Demonstrate Flaws In Some Phantom Traffic Proposals.

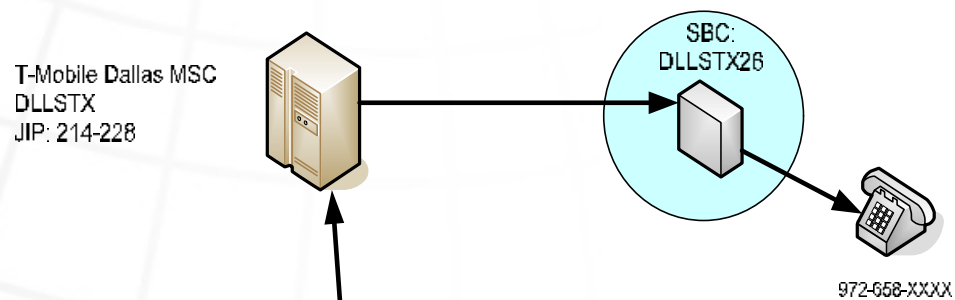


Little Rock, AR Originated Mobile Phone Call to Dallas, TX Landline
(Mobile InterMTA call subject to Interstate Access)

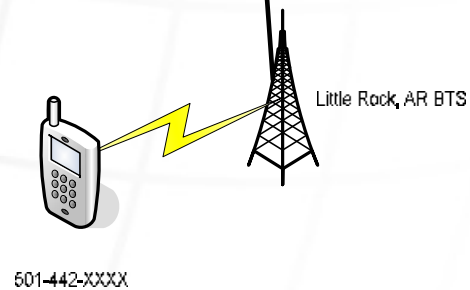
CPN/CN (501-442 to 972-658): InterMTA – Interstate Access

JIP (214-228 to 972-658): IntraMTA – Reciprocal Compensation

MTA 7



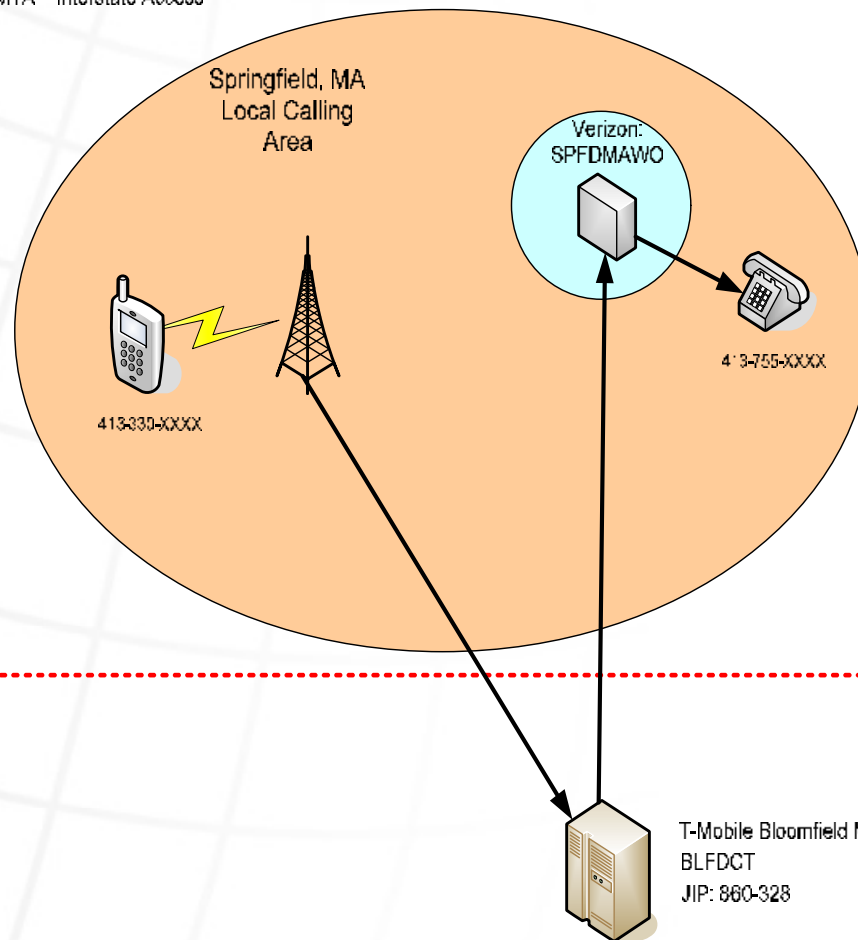
MTA 40



**Springfield Originated Mobile Phone Call to Springfield Landline
(Mobile IntraMTA Call subject to Reciprocal Compensation)**

CPN/CN (413-330 to 413-775): IntraMTA – Reciprocal Compensation

JIP (860-328 to 413-755): InterMTA – Interstate Access



MTA 8

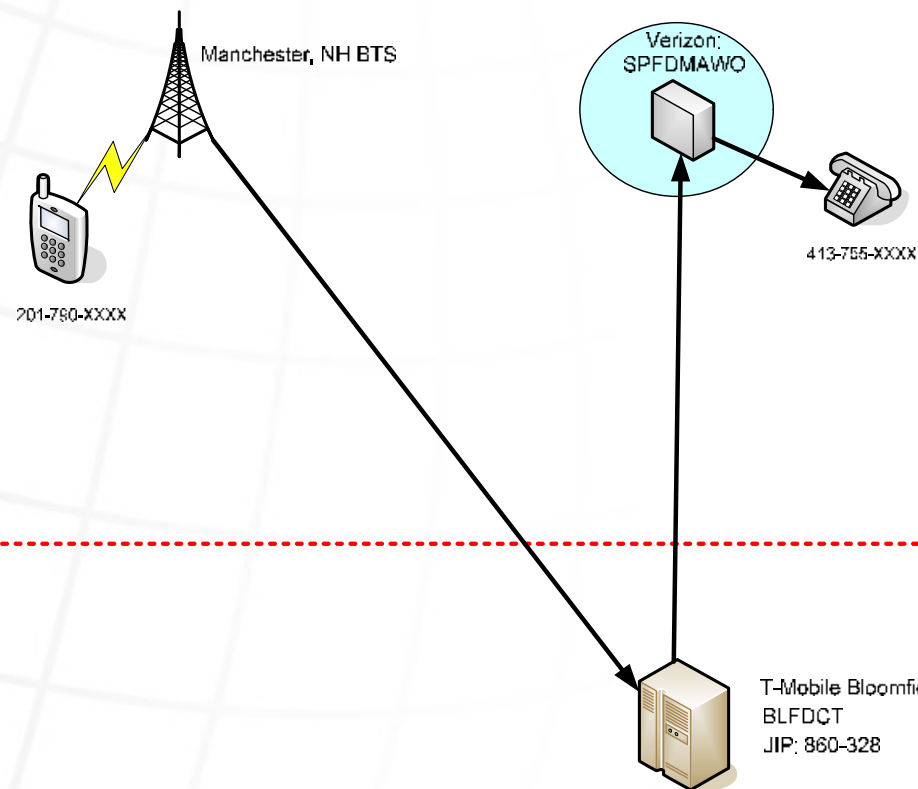
MTA 1

**Springfield Originated Mobile Phone Call to Springfield Landline
(Mobile IntraMTA Call subject to Reciprocal Compensation)**

CPN/CN (201-790 to 413-775): InterMTA – Interstate Access

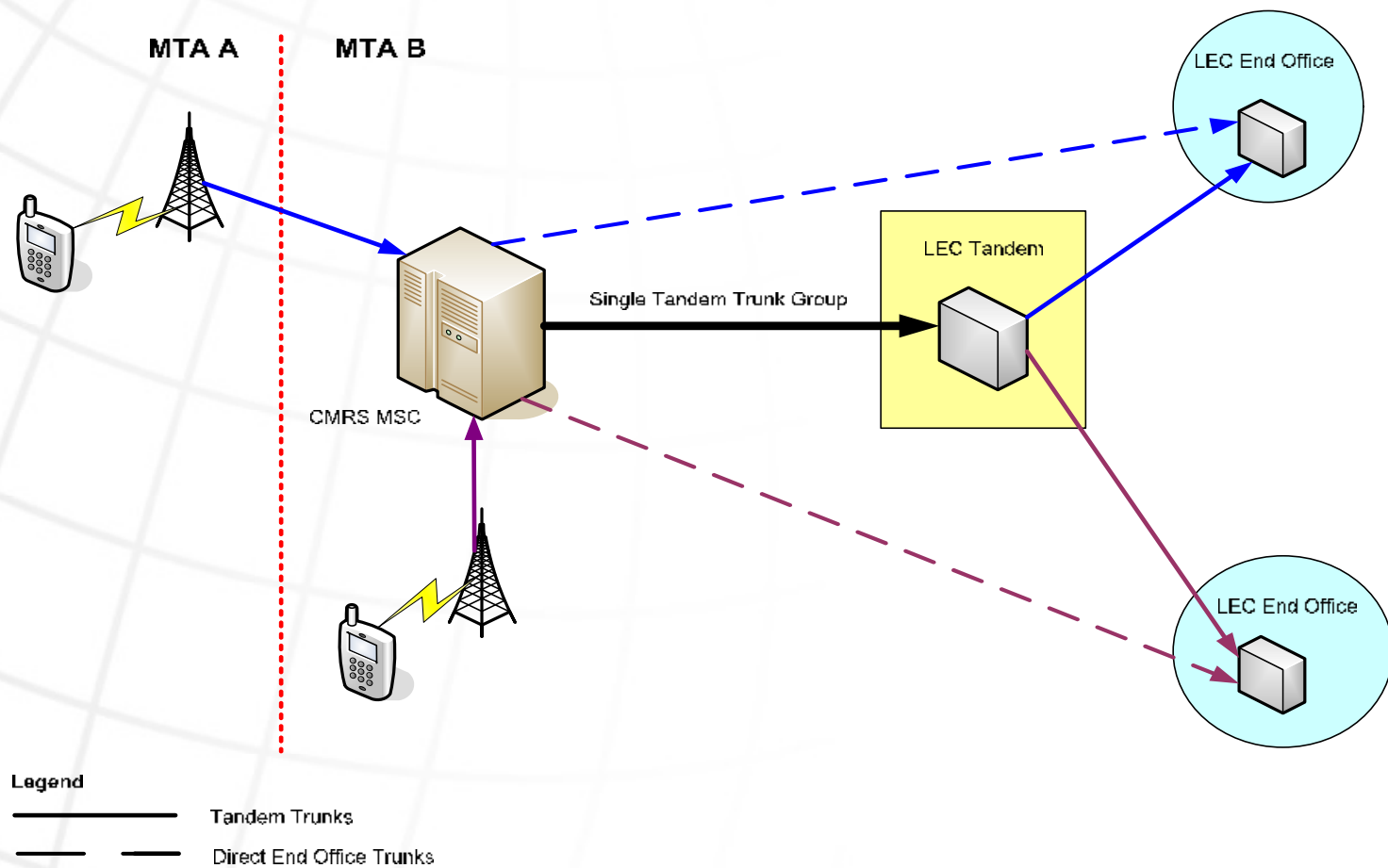
JIP (860-328 to 413-755): InterMTA – Interstate Access

MTA 8



MTA 1

LERG Routing – CMRS Originated (Single Tandem Architecture)

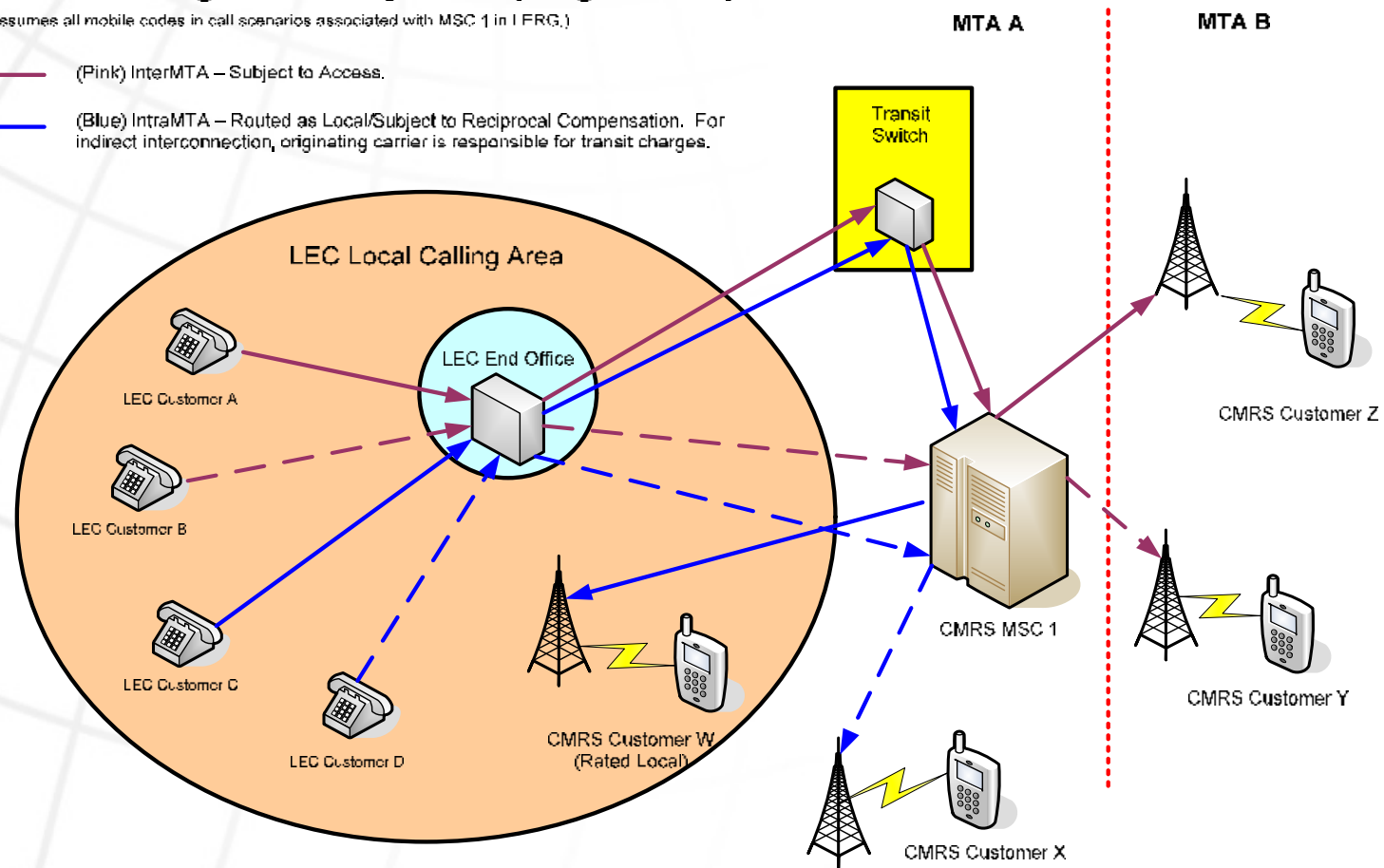


LERG Routing – LEC Originated (Single LATA)

(Assumes all mobile codes in call scenarios associated with MSC 1 in LERG.)

(Pink) InterMTA – Subject to Access.

(Blue) IntraMTA – Routed as Local/Subject to Reciprocal Compensation. For indirect interconnection, originating carrier is responsible for transit charges.





T-Mobile®
Get more from life®

The logo features a magenta 'T' with small squares on its horizontal bars, followed by 'Mobile' in a grey serif font with a registered trademark symbol. The tagline 'Get more from life' is in a grey sans-serif font with a registered trademark symbol. The background has a light grey grid pattern on the left and a solid grey bar at the top.